



**PETER A. ROMERO**

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May 2, 2022

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**APPLICATION DENIED**

**SO ORDERED** *Vern Broderick*

**VERNON S. BRODERICK**

**U.S.D.J. 05/03/22**

If Defendants wish to seek an extension of time, they must enter a notice of appearance in this action and make the extension request themselves.

Re: *Ronald Cerrato Galan v. Style Management Co., Inc., et al.*  
Docket No.: 22-cv-01137 (VSB)

Dear Judge Broderick:

This firm represents the Plaintiff Ronald Cerrato Galan, in the above-referenced matter, against Defendants Style Management Co., Inc., Andrew Rosenberg and Stefanie Rosenberg, his former employers, for alleged violations of the Fair Labor Standards Act and New York Labor Law. This action was commenced on February 9, 2022. Following service of process, Defendants have failed to file an Answer or otherwise move with respect to Plaintiff's Complaint. As such, the Court entered an Order directing Plaintiff to file his motion for a default judgment on or before May 12, 2022, which was extended once from April 27, 2022. D.E. 9-11. Since that Order, Plaintiff has been contacted by counsel for Defendants, who indicated Defendants' intend to participate in and defend this lawsuit, and requested an extension of time to submit their Answer or otherwise move with respect to Plaintiff's Complaint. Attached as Exhibit A is a stipulation by all parties assenting to extending Defendants' time to submit an Answer or otherwise move until June 1, 2022. As a result of Defendants' subsequent communications and this stipulation, it appears that a motion for a default judgment is not necessary as Defendants are taking action to participate in this litigation. Plaintiff believes that it would be a waste of Your Honor's resources to entertain and inappropriate for Plaintiff to file a motion for a default judgment in light of these recent developments.

Accordingly, Plaintiff respectfully requests, with all parties' consent, that the Court grant Defendants an extension of time to submit their Answer or other move in response to Plaintiff's Complaint until June 1, 2022. Plaintiff also requests that the Court cancel Plaintiff's May 12, 2022 deadline to serve a motion for a default judgment, with leave to file such a motion if Defendants do not file their Answer or otherwise move by June 1, 2022.

We thank the Court for its kind consideration of these requests.

Respectfully submitted,



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*Via Electronic Mail*